



# MEMO ENDORSED

U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

April 25, 2019

BY CM/ECF

The Honorable Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: United States v. Anilesh Ahuja, et al.  
18 Cr. 328 (KPF)

Dear Judge Failla:

Under the disclosure schedule agreed to by the parties and so-ordered by the Court, the Government is scheduled to produce to the defendants its 18 U.S.C. § 3500 and *Giglio* materials, and witness list, by tomorrow, April 26, 2019, in advance of the June 3 trial in this case. The Government remains prepared to make those productions tomorrow, but respectfully requests permission to defer production of those materials until the Court has ruled on defendant Anilesh Ahuja's pending motion to adjourn the trial, which the Government opposed earlier this evening. The Government is prepared to produce its §3500 materials promptly upon the resolution of the pending motion.

Respectfully submitted,

AUDREY STRAUSS  
Attorney for the United States,  
Acting Under Authority Conferred by  
28 U.S.C. § 515

By: \_\_\_\_\_ /s/

Andrea M. Griswold  
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Max Nicholas  
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Application GRANTED.

SO ORDERED.

Dated: April 25, 2019  
New York, New York

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE